## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION	
	MDL No. 2419
This Document Relates To: All Cases	Master Dkt. No. 1:13-md-2419-RWZ

## <u>DECLARATION OF ABIGAIL HEMANI IN SUPPORT OF DEFENDANT UNIFIRST</u> <u>CORPORATION'S GLOBAL MOTION TO DISMISS</u>

- I, Abigail Hemani, declare under penalty of perjury:
- 1. I am a Partner at the law firm of Goodwin Procter LLP and one of the counsel of record to Defendant UniFirst Corporation ("UniFirst") in the above-captioned action. I am an active member of the Massachusetts bar. I submit this declaration in support of UniFirst's Motion to Dismiss the Master Complaint. As part of my responsibilities at Goodwin Procter LLP, I have been personally involved in, and have direct knowledge of, the matters addressed by this declaration.
- 2. Attached as Exhibit A is a true and correct copy of United States Pharmacopeia, 35 <797> "Pharmaceutical Compounding-Sterile Preparations," ("USP 797").

3. Attached as Exhibit B is a true and correct copy of a UniClean Contamination Control Service Agreement between UniFirst and New England Compounding Pharmacy, Inc. (May 13, 2011) ("CCSA"), Bates labeled UNI-MDL\_000009-12.

I hereby declare under penalties of perjury that the foregoing is true and accurate.

/s/ Abigail K. Hemani

Date: April 1, 2014

## **CERTIFICATE OF SERVICE**

I, Abigail K. Hemani, hereby certify that the foregoing document, filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 1, 2014.

/s/ Abigail K. Hemani